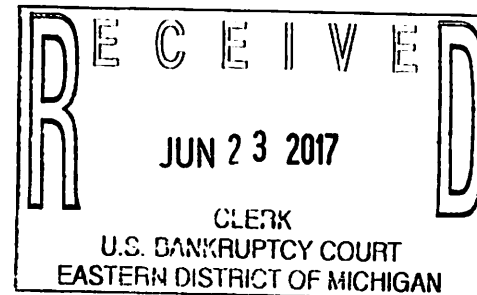


UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION



In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

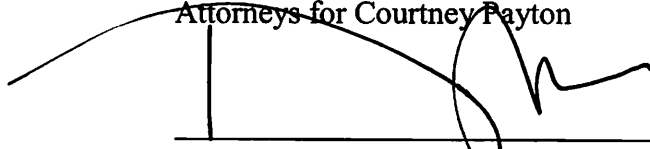
**COURTNEY D. PAYTON'S MOTION FOR LEAVE TO
FILE IN THE TRADITIONAL PAPER MANNER**

Courtney D. Payton ("Mr. Payton") by his undersigned counsel, the ~~Mike Morse Law~~ Firm, moves this Honorable Court for the entry of an Order granting him leave to file documents, including his Objection and Response to City of Detroit's Motion for (I) Determination that Courtney D. Payton Willfully Violated this Court's Order Granting Motion to Enforce Entered at Docket Number 10743, and (II) Awarding Compensatory and Punitive Sanctions, in the traditional, paper manner. This Motion is based on the fact that, while Mr. Payton's counsel, is admitted to practice in other federal courts having jurisdiction over Michigan matters, including the United States District Court for the Eastern District of Michigan, neither Mr. Payton nor his counsel currently have an e-filing password available to them to electronically file documents with this Honorable Court.

WHEREFORE, for the foregoing reasons, Mr. Payton respectfully requests that this Honorable Court grant the relief sought in this Motion and enter an Order granting him leave to file documents, including his Objection and Response to City of Detroit's Motion for (I) Determination that Courtney D. Payton Willfully Violated this Court's Order Granting Motion to Enforce Entered at Docket Number 10743, and (II) Awarding Compensatory and Punitive Sanctions, in the traditional, paper manner.

Respectfully submitted,

MIKE MORSE LAW FIRM
Attorneys for Courtney Payton

A handwritten signature in black ink, appearing to read 'Marc J. Mendelson', is written over a horizontal line. The signature is stylized with a large loop and a trailing flourish.

Marc J. Mendelson P-52798

Donald J. Cummings P-70969

24901 Northwestern Highway, Suite 700

Southfield, MI 48075-1816

(248) 350-9050

Dated: June 16, 2017

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

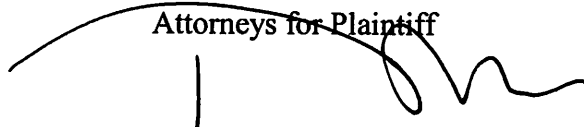
In re:	Bankruptcy Case No. 13-53846
City of Detroit, Michigan,	Judge Thomas J. Tucker
Debtor.	Chapter 9

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 16, 2017, he served a copy of the foregoing **COURTNEY D. PAYTON'S MOTION FOR LEAVE TO FILE IN THE TRADITIONAL PAPER MANNER** upon counsel for the City of Detroit in the manner described below: Via first class mail and email:

Marc N. Swanson, P71149
Miller, Canfield, Paddock and Stone, PLC
150 West Jefferson, Suite 2500
Detroit, MI 48226
Email: swansonm@millercanfield.com

Respectfully submitted,
MIKE MORSE LAW FIRM
Attorneys for Plaintiff



Marc J. Mendelson P-52798
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24901 Northwestern Highway, Suite 700
Southfield, MI 48075-1816
(248) 350-9050

Dated: June 16, 2017

FILED (I)
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U.S. BANKRUPTCY COURT
E.D. MICHIGAN-DETROIT